

STATE OF NEW JERSEY)
)
COUNTY OF BERGEN)

AFFIDAVIT OF ATTORNEY

R. K. BRIDWELL

FILED
IN CLERK'S OFFICE

NOV 18 P 12:11

U.S. DISTRICT COURT
DISTRICT OF MASS.

TO: F&D International and Bisbay Holdings International

I, R. K. Bridwell, on oath, state:

03 12547 RCL

1. I am an attorney in good standing in the State of New Jersey.
2. I have been Senior Vice President & General Counsel of SGS North America Inc. ("SGS-NA") and General Counsel of SGS Control Services Inc. ("SGS-CSI"), a wholly owed subsidiary of SGS-NA, since 1999.
3. Effective July 1, 2003, SGS-CSI was merged into SGS-NA.
4. I have reviewed the two-page document dated "Nov 7, 2003" attached hereto as Exhibit A purporting to be an SGS-CSI certificate of Weight and Quality (of Containers).
5. Exhibit A is a forgery.
6. The forgery is apparent because, among other things:
 - a. The logo in the upper left corner has not been in use for over a year;
 - b. SGS-CSI has never had an office in Orange, California;
 - c. The indicated telephone and fax numbers are not SGS-CSI numbers;
 - d. Robert M. Polley has never been an employee of SGS-CSI;

e. Mineral Services has never been a part of SGS-CSI;

f. On November 7, 2003, SGS-CSI was no longer operating under that name. Its business was conducted and certificates and reports were then issued under the name Oil, Gas & Chemicals Division of SGS North America Inc.;

g. I have checked SGS-NA records and there is no record that SGS-NA was asked to or did in fact inspect the goods and containers described in Exhibit A; and

h. I have checked SGS-NA records and there is no record of Bisbay Holdings International having been a client.

7. The two-page document dated "March 17, 2003" attached hereto as Exhibit B purporting to be an SGS-CSI Certificate of Weight and Quality (of Containers) was provided to me on December 4, 2003 by Bisbay Holdings International. Exhibit B is also a forgery because, among other things;

a. J.B. Williamson has never been an employee of SGS-CSI;

b. Mineral Services has never been a part of SGS-CSI;

c. AMP Products, Inc. has never been a client of SGS-CSI;

d. I have checked SGS-NA records and there is no record that SGS-NA was asked to or did in fact inspect the goods and containers described in Exhibit B; and

e. I have checked SGS-NA records and there is no record of AMT Products, Inc. having been a client.



SGS Control Services Inc.

333 City Blvd.
Orange, California 92668
Tel: (714) 516-8110
Fax: (714) 464-4460
TLX: 6781407

Nov 7, 2003

Bisbay Holdings International
6 Pleasant Street,
Malden, MA 02148

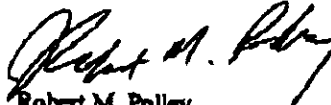
CERTIFICATE OF WEIGHT AND QUALITY (OF CONTAINERS)

MATERIAL : DESCRIBED AS MIXED OF SCRAP COPPER
WIRES/CABLES AND ELECTRIC MOTORS
INSPECTED AT : FRESNO AND LONG BEACH, CALIFORNIA
DATE : NOVEMBER 5-6, 2003
OUR FILE NO. : 9236596

<u>CONTAINER NO./SEAL NO.:</u>	<u>PACKING</u>	<u>SIZE</u>	<u>NET WEIGHT</u>
YMLU 2485795/11932	BUNDLED/LOOSE	20FT.	49126.00LBS
WFHU 1221670/11908	BUNDLED/LOOSE	20FT.	48910.00LBS
YMLU 2803767/01973	BUNDLED/LOOSE	20FT.	49150.00LBS
YMLU 2520561/8464105	BUNDLED/LOOSE	20FT.	48450.00LBS

All information relating to quality, packing, quantity and weight is as per visual observations of material as accessible in each previously loaded container.

SGS CONTROL SERVICES INC.


Robert M. Polley
Mineral Services

RMP/

Page 2 of 2 pages

SGS 020

This report does not verify or in the proper description of the goods unless specified. All inspections are carried out in the best of our knowledge and ability and our responsibility is limited to the detection of commercial cases.
Member of the SGS Group (publicly traded on the stock exchange)

EXHIBIT B - BRIDWELL AFFIDAVIT

Monday, March 17, 2003 10:24 AM

SGS NORTH AMERICA (281)478-2734

p.01



SGS Control Services Inc.

P.O.Box 550
Dear Park, Texas 77536
Tel: (281) 478-7170
Fax: (281) 478-2734
TLX: 785085

March 17, 2003

AMT Products, Inc.
1120 New Point Road
Houston, TX 77026

CERTIFICATE OF QUANTITY/WEIGHT AND QUALITY (OF CONTAINERS)

MATERIAL : DESCRIBED AS SCRAP COPPER WIRES/CABLES
INSPECTED AT : HOUSTON, TX
DATE : MARCH 14, 2003
OUR FILE NO. : 5127976

In accordance with instructions received, we attended the supplier's facilities in Houston, Texas on March 14, 2003 for the purpose of inspecting contents of a total fifteen (15) 20 ft. ocean containers contain material as described above, and to supervise the loading, control the cargo weight and visually verify copper content.

All containers at above location were fully loaded with bundled material. Each container was opened for inspection, and from visual observations of accessible material within each container or at the door area of each container, we estimate that the copper content of the bundled scrap copper wires/cables was not less than sixty-five percent (65%). There were about 20 bundles of 1000kgs in each container. The quantity of the total fifteen (15) containers was about 300MT. Most of the material was beyond the inspector's observable area.

Accordingly, the following containers were inspected by us as indicated above:

<u>CONTAINER NO.</u>	<u>PACKING</u>	<u>SIZE</u>	<u>CONTAINER NO.</u>	<u>PACKING</u>	<u>SIZE</u>
FSCU 3398663	BUNDLED	20FT.	ICSU 5585963	BUNDLED	20FT.
FSCU 3311289	BUNDLED	20FT.	ICSU 5423335	BUNDLED	20FT.
FSCU 3744036	BUNDLED	20FT.	ICSU 5111286	BUNDLED	20FT.
FSCU 3323446	BUNDLED	20FT.	SCXU 6235696	BUNDLED	20FT.
GSTU 2136561	BUNDLED	20FT.	SCXU 6352557	BUNDLED	20FT.
GSTU 2611153	BUNDLED	20FT.	ZIMU 2538869	BUNDLED	20FT.
GSTU 2463598	BUNDLED	20FT.	TRIU 3326912	BUNDLED	20FT.
GSTU 2354363	BUNDLED	20FT.			

Page 1 of 2 pages

The report does not testify as to the exact description of the goods unless specified. All inspections are carried out to the best of our knowledge and ability and our responsibility is limited to the scope of our inspection only.
Member of the SGS Group (Société Générale de Surveillance)

SGS 028

5/15/2003 4:57 PM FROM: Fax AMT.

Boundary of Symtech TO: +1 (781) 397 0900 FAX

03 of 000

WEDNESDAY, MARCH 12, 2003 10:25 AM

SGS NORTH AMERICA (281) 478-2734

p.02



SGS Control Services Inc.

P.O.Box 550
Deer Park, Texas 77536
Tel: (281) 478-7170
Fax: (281) 478-2734
TOLL FREE

March 17, 2003

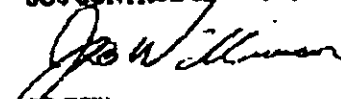
AMT Products, Inc.
1120 New Point Road
Houston, TX 77026

CERTIFICATE OF QUANTITY/WEIGHT AND QUALITY(OF CONTAINERS)

MATERIAL	: DESCRIBED AS SCRAP COPPER WIRES/CABLES
INSPECTED AT	: HOUSTON, TX
DATE	: MARCH 14, 2003
OUR FILE NO.	: 5127976

All information relating to quality, packing, quantity and weight is as per visual observations of material as accessible in each previously loaded container.

SGS CONTROL SERVICES INC.


J.B. Williamson
Mineral Services

JBW/

Page 2 of 2 pages

This report does not verify the accuracy of the data provided by the client. All measurements are based on the best of our knowledge and ability at the time of inspection. We are not responsible for errors in the data provided by the client.

Member of the SGS Group (Specialized Services & Global Services)

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781 397 0900

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EXHIBIT C - BRIDWELL AFFIDAVIT

SGS

December 5, 2003

Mr. Frank Yuan
F&D International Trading
15012 NE 8th Place
Bellevue, WA 98007

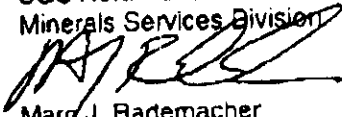
Dear Mr. Yuan,

This letter is in response to the recent inquiry into the authenticity of the certificate dated November 7, 2003. The document you have sent to us is not an authentic SGS certificate. It is a forgery. SGS does not have an office in Orange, CA, does not have an employee named Robert M. Polley, does not have a client named Bisbay Holdings International, and did not inspect the identified copper scrap or containers for Bisbay or anyone else.

SGS takes the falsification of its services, reports and certificates very seriously. We will cooperate fully with your investigation. Mr. Wally Adebayo of Bisbay contacted us and we have also confirmed to him that the document you have sent to us is false. He has acknowledged that Bisbay did not retain SGS to perform the inspection. He says that he received the false document from his supplier.

We can suggest that in any of your future transactions that you contact SGS directly. If there are any other questions or comments regarding this matter, please do not hesitate to contact me at 303.373.4772.

SGS North America Inc.
Minerals Services Division



Marg J. Rademacher
Vice President, Western Operations

CC: Mr. W. Adebayo, Bisbay Holding International
Mr. Ken Bridwell, SGS North America Inc. General Counsel
Tel : 201.935.1500

SGS North America Inc.

Minerals Services Division
4885 Paris Street Suite 8-200, Denver, CO 80239

t (303) 373.4772 f (303) 373.4884

www.sgs.com

Member of SGS Group (Société Générale de Surveillance)

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DEC 05 2003 12:19

303 373 4884

PAGE. 02

EXHIBIT D - BRIDWELL AFFIDAVIT

SGS

December 5, 2003

Mr. Wally Adebayo
Bisbay Holdings International
6 Pleasant Street
Malden, MA 02148


Dear Mr. Adebayo:

This letter is in response to the recent inquiry into the authenticity of the certificate dated March 17, 2003. The document you have sent to us is not an authentic SGS certificate. It is a forgery. SGS does not have an employee named J.B. Williamson, does not have a client named AMT Products, Inc., and did not inspect the identified copper scrap or containers for AMT Products or anyone else.

SGS takes the falsification of its services, reports and certificates very seriously. We will cooperate fully with your investigation.

We can suggest that in any of your future transactions that you contact SGS directly. If there are any other questions or comments regarding this matter, please do not hesitate to contact me at 303.373.4772.

SGS North America Inc.
Minerals Services Division



Marc J. Rademacher
Vice President, Western Operations

CC: Mr. Ken Bridwell, SGS North America Inc. General Counsel
Tel: 201.935.1500

SGS North America Inc.

Minerals Services Division
4665 Park Street Suite B-200, Denver, CO 80239

T (303) 373.4772 F (303) 373.4884

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Member of SGS Group (Société Générale de Surveillance)

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